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UNITED STATES OF AMERICA POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268–0001

Periodic Reporting (Proposal Thirteen)

Docket No. RM2015-7

CHAIRMAN'S INFORMATION REQUEST NO. 2

(Issued February 4, 2015)

To clarify the Postal Service's petition to consider changes to analytical principles, filed December 11, 2014, the Postal Service is requested to provide a written response to the following questions.¹ The written response should be provided by February 11, 2015.

- 1. Please refer to Library Reference USPS-RM2015-7/1, "Report on the City Carrier Street Time Study" (Report) at 16–19, which develops the method to convert in-receptacle and parcel/accountable time pools from activity times as a percent of gross street time to activity times as a percent of directly attributable street time, and uses this information to develop the time pool proportions shown in Table 8.
 - a. Please confirm that the sum of the street time pools of parcel/accountable and in-receptacle delivery is 9.79 percent, as shown in Table 8.
 - b. If not confirmed, please explain.

¹ See Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Change in Analytical Principles (Proposal Thirteen), December 11, 2014.

- 2. Please refer to the Report at 18, which states "Accuracy requires using the independently measured in-receptacle package delivery time proportion to reduce the route evaluation delivery proportion." This calculation is done in Table 8.
 - a. Please explain how the regular delivery time pool proportion, which is
 83.38 percent of gross street time, was modified so that the regular delivery time pool represents 78.23 percent of direct street time.
 - b. Please provide all workpapers, with links, which show how the regular delivery time pool as a share of gross street time was modified to become regular delivery time as a share of direct street time.
- 3. Please refer to the Postal Service Response to CHIR No.1, question 9b, which identifies the SAS log file which created scanrouteday_masked_zips.² Please provide the SAS program(s) that correspond to this log and the raw scan data used as inputs to this program. Please also explain the meaning of each variable read from the raw dataset.
- 4. Please compare the time pool proportions in Table 9 of the Report at 19 and Docket No. ACR2013, Library Reference USPS–FY13–32 Revised 2-6-14, CS06&7.Revised, Worksheet 7.0.4.1, for the Regular Delivery, Travel To/From, and Network Travel pools.
 - a. For each of these pools, please identify the change in proportion that results from the use of Form 3999 data.
 - Please discuss the cause(s) of the change in proportion for each of these pools. Identify the connection between each cause and the specific pool(s) affected.
 - c. Please describe and discuss the impact, both individually and collectively, of the changes in these cost pool proportions.

² Response of the United States Postal Service to Questions 1-16 and 19-28 of Chairman's Information Request No. 1, January 12, 2015 (Postal Service Response to CHIR No. 1, question 9b).

- 5. The following questions seek detailed information on the motions which comprise in-receptacle delivery.
 - a. Please describe each motion a carrier makes to deliver in-receptacle parcels during regular operations. In your answer please address all motions, both prescribed and those which normally occur in practice.
 - b. In your response, please include a discussion of how in-receptacle parcel delivery motions interact with other delivery motions which answers the following questions:
 - i. What instructions are carriers provided with respect to the delivery of in-receptacle mail when there is also other mail to deliver to the same receptacle? For example, are carriers instructed to deliver all mail other than in-receptacle parcels in a single bundle into the receptacle, and then separately deliver in-receptacle parcels?
 - ii. What motions does a carrier make after cased mail, DPS mail, FSS mail and Sequenced mail is inserted into the receptacle?
 - iii. Will a carrier sometimes combine an in-receptacle parcel with other mail, perhaps delivering cased mail and in-receptacle mail in a single bundle, or will a carrier always deliver an in-receptacle parcel only after delivering all other mail?
 - iv. If the answer to b.iii is that a carrier sometimes combines an in-receptacle parcel with other mail, please estimate the percentage of times an in-receptacle parcel is delivered simultaneously with other mail inserted into the customer's receptacle.
- 6. Please refer to pages 98 and 99 of the Report. The discussion on these pages seems to provide different accounts of how mail delivered at neighborhood delivery and collection box units (NDCBUs) was scanned. Please clarify the process of scanning for NDCBU deliveries.

- 7. Please refer to page 99 of the Report, which states that in order to remove in-receptacle scan time "...participating ZIP Codes were asked to keep track of the additional daily street time that was required to complete the study scans." Please also refer to the Webcast of the January 14, 2015 Technical Conference, at 1:01:20 (which begins "so to take that out..."), where it was explained that individuals in ZIP Codes were asked to estimate the time it took their carriers to do these scans during a day, which was combined with data on the number of scans performed that day to calculate an average of 12 seconds to perform each scan.
 - a. Please provide a detailed description of the method used to estimate in-receptacle barcode scan time, and to remove this scan time to isolate in-receptacle delivery time.
 - b. How many ZIP Code days were involved in this data collection?
 - c. Were the individuals asked to determine in-receptacle scan time for one day for the entire ZIP Code?
 - d. How did the individuals measure the time it took to perform all in-receptacle scans for each day?
 - e. Were instructions describing how to measure the time to do all in-receptacle scans for an entire day distributed to participating individuals? If so, please provide a copy of these instructions.
- 8. Please provide electronic copies of the raw barcode scan data and all SAS and/or Excel files (with links) used to calculate an average in-receptacle scan time of 12 seconds.
- 9. Please refer to CS06&7_Proposal_13.xlsx, Worksheet: 7.0.4.2.
 - a. Please confirm that barcode scan time was not removed from the in-receptacle parcel delivery time pool shown in this worksheet.
 - b. If confirmed, please explain why it was not removed.
 - c. If not confirmed, please explain the meaning of the note in cell G15, "Includes barcode scan time."

10. Please refer to the Postal Service Response to CHIR No. 1, question 17(a)(iii).³
For each of the identified Variable Selection Methods (Sequential Regression, Best Subset Selection, and Shrinkage Models), please discuss the "trade-off" between improving model fit and inconsistent parameter estimates for the purposes of developing delivery variabilities by shape.

By the Acting Chairman.

Robert G. Taub

³ Response of the United States Postal Service to Questions 17-18 of Chairman's Information Request No. 1, January 15, 2015 (Postal Service Response to CHIR No. 1, question 17(a)(iii).